

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION**

In Re:)	Case No. 21-81040
)	
GWENDOLYN LATIN,)	Judge Lynch
)	
Debtor.)	Chapter 13

NOTICE OF MOTION

To the following parties that have been noticed by CM/ECF electronic delivery:

U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

Lydia Meyer, Chapter 13 Trustee

To the following parties that have been noticed by first-class U.S. Mail, postage prepaid:

See Attached List.

PLEASE TAKE NOTICE that on April 6, 2023, at 9:00am, I will appear before the Honorable Judge Lynch, or any judge sitting in that judge's place, **either** in courtroom 3100 of the U.S. Courthouse at 327 South Church Street, Rockford, IL 61101, or electronically as described below, and present the **Motion to Modify Plan**, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-8287666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 160 291 5226, and the passcode is 852255. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Respectfully Submitted,

/s/ Dustin B. Allen

Attorney for Debtor

CERTIFICATE OF SERVICE

I, , hereby certify that this Notice and all attachments were served in the manner described upon the parties named above, on or before March 16, 2023, before 5:00PM.

/s/ Dustin B. Allen
Attorney for Debtor (ARDC#6312451)
P.O. Box 681232
Schaumburg, IL 60168
773-980-9004
DAllen@DustinBAllen.com

Service List

**Afni, Inc.
Po Box 3097
Bloomington, IL 61702-3097**

**Sound Physicians Emergency Med of Illinois
PO Box 1123
Minneapolis, MN 55440-1123**

**Amercred
400 West Lake Street Suite 111
Roselle, IL 60172-3574**

**Winnebago County Clerk
404 Elm Street - Room104
Rockford, IL 61101-1276**

**American Tax Lien
120 N. LaSalle
Suite 2850
Chicago, IL 60602-2460**

**Winnebago Treasurer
404 Elm Street - Room 205
Rockford, IL 61101-1244**

**ComEd
PO Box 805379
Chicago, IL 60680-4179**

**Gwendolyn Latin
514 South Ave
Rockford, IL 61109-1035**

**Commonwealth Edison Company
Attn: Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523-1502**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION**

In Re:)	Case No. 21-81040
)	
GWENDOLYN LATIN,)	Judge Lynch
)	
Debtor.)	Chapter 13

MOTION TO MODIFY PLAN

NOW COMES the Debtor, GWENDOLYN LATIN, by and through her attorney, Dustin B.

Allen, to present this Motion to Modify Plan, and in support thereof, states as follows:

1. The Debtor filed for relief under Chapter 13 of the Title 11 of the United States Code on August 18, 2021.
2. The Debtor's confirmed Chapter 13 plan calls for payments of \$225.00 per month for 55 months, with set payments to the Winnebago County Treasurer for property taxes, and repayment to general, unsecured creditors of 10% of their allowed claims.
3. On March 15, 2023, the Winnebago Treasurer amended their claims, Claim 2 and Claim 3, to reflect \$0.00. Indeed, the County has recently been returning to the Trustee all set payments that they have been receiving.
4. On March 15, 2023, the Debtor's attorney called the Winnebago Treasurer and learned from a representative that the claims had been amended because the prior claims were overvalued, that the payments so far through the plan were sufficient to repay the actual claims, and that the county no longer asserts that the Debtor owes any pre-petition property taxes.
5. Accordingly, the Debtor respectfully requests that the plan be amended to remove all repayment to Winnebago County in Section 3.2 of the plan.

WHEREFORE, the Debtor prays that this Court enter an order modifying the plan, and any other relief this Honorable Court may deem just and proper.

Respectfully Submitted,

/s/ Dustin B. Allen

Attorney for Debtor (ARDC#6312451)

P.O. Box 681232

Schaumburg, IL 60168

773-980-9004

DAllen@DustinBAllen.com